

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: C.R. BARD, INC., PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION

MDL No. 2187

IN RE: AMERICAN MEDICAL SYSTEMS, INC.
PELVIC REPAIR SYSTEMS PRODUCTS
LIABILITY LITIGATION

MDL No. 2325

IN RE: BOSTON SCIENTIFIC CORP., PELVIC
REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION

MDL No. 2326

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM
PRODUCTS LIABILITY LITIGATION

MDL No. 2327

IN RE: COLOPLAST CORP., PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION

MDL No. 2387

IN RE: COOK MEDICAL, INC, PELVIC REPAIR
SYSTEM PRODUCTS LIABILITY LITIGATION

MDL No. 2440

IN RE NEOMEDIC PELVIC REPAIR SYSTEM
PRODUCT LIABILITY LITIGATION

MDL No. 2511

This Document Relates To All Cases

Motion for Entry of Order

COME NOW, the undersigned, and respectfully request the entry of an Order permitting the substitution of FARRELL LAW as the recipient of all future residual fees in the place of GREENE KETCHUM FARRELL BAILEY & TWEEL, LLP, as set forth in the Final Written Recommendation, with the External Review Specialist's Recommended Allocation for distribution of the common benefit fund. [ECF Nos. 7051, 7051-1]. In support of the motion, the undersigned stipulate as follows:

1. This Court entered an Allocation Order in each of the transvaginal mesh ("TVM") cases referenced above which adopts and incorporates the FCC's Final Written

Recommendation regarding the common benefit fund. [ECF Nos. 7051, 7051-1] (filed March 12, 2019).

2. The FCC's Final Written Recommendation includes a recommendation of attorney fees awarded to GREENE KETCHUM FARRELL BAILEY & TWEEL, LLP, from the common benefit fund. [ECF Nos. 7051 at p. 55, 7051-1 at Exhibit 1].

3. Since that time, Mr. Farrell has amicably dissociated with GREENE KETCHUM FARRELL BAILEY & TWEEL, LLP, effective January 31, 2020, and formed FARRELL LAW. Under the terms of the dissociation agreement, all residual TVM fees are to be paid directly to FARRELL LAW.

4. This substitution will authorize direct transfer of future residual fees to FARRELL LAW and promote the further dissociation of Mr. Farrell from his former partnership. By signing this motion, each and every former partner of GREENE KETCHUM FARRELL BAILEY & TWEEL, LLP, consents to this substitution.

WHEREFORE, the undersigned respectfully request this Honorable Court enter an order authorizing the substitution of "**FARRELL LAW**" for "Greene Ketchum Farrell Bailey & Tweel, LLP" for all residual fees arising from the common benefit fund.

Filed this 23rd day of April, 2020.

/s/ Paul T. Farrell, Jr.

Paul T. Farrell, Jr. (WVSB No. 7443)

FARRELL LAW

P.O. Box 1180

Huntington, WV 25714-1180

422 Ninth Street, 3rd Floor

Huntington, West Virginia 25701

office: 304.523.7285

cell: 304.654.8281

paul@farrell.law

/s/ Bert Ketchum

Bert Ketchum (WVSB No. 6618)

Lawrence J. Tweel (WVSB No. 3825)

Larry A. Bailey (WVSB No. No. 221)

GREENE, KETCHUM, BAILEY & TWEEL LLP

PO Box 2389

Huntington, WV 25724-2389

Office: (304) 525-9115

Toll free: (800) 479-0053

Fax: (304) 529-3284

bert@greeneketchum.com

CERTIFICATE OF SERVICE

The undersigned affirms that a copy of this motion has been electronically sent to, and approved by, the following on **April 23, 2020**:

Bert Ketchum
GREENE, KETCHUM, BAILEY & TWEEL LLP
bert@greeneketchum.com

Lawrence J. Tweel
GREENE, KETCHUM, BAILEY & TWEEL LLP
larry@greeneketchum.com

Larry A. Bailey
GREENE, KETCHUM, BAILEY & TWEEL LLP
pete@greeneketchum.com

and further certifies that on this 23rd day of April, 2020, he electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

/s/ Paul T. Farrell, Jr.
Paul T. Farrell, Jr., Esq. (WVSB No. 7443)
FARRELL LAW
P.O. Box 1180
Huntington, WV 25714-1180
422 Ninth Street, 3rd Floor
Huntington, West Virginia 25701
office: 304.523.7285
cell: 304.654.8281
email: paul@farrell.law